

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)
JOANN INC., *et al.*,¹) Chapter 11
Debtors.) Case No. 25-10068 (CTG)
) (Jointly Administered)
) Hearing Date: July 10, 2025 at 10:00 a.m. (ET)
) Obj. Deadline: June 20, 2025 at 4:00 p.m. (ET)

**NOTICE OF DEBTORS' FIRST OMNIBUS
OBJECTION TO CERTAIN CLAIMS (SUBSTANTIVE)
(Reduced and Reclassified Claims, No Liability Claims, Reclassified Claims)**

TO ALL PARTIES RECEIVING THIS OBJECTION:

YOU SHOULD REVIEW THE PROPOSED ORDER, INCLUDING EXHIBIT 1, EXHIBIT 2 AND EXHIBIT 3, TO LOCATE YOUR NAME AND CLAIM(S) AND DETERMINE IF YOUR CLAIM(S) ARE SUBJECT TO THIS OBJECTION. IF YOUR CLAIM(S) ARE LISTED IN THE PROPOSED ORDER AND/OR ARE ON THE EXHIBITS ATTACHED TO THE PROPOSED ORDER, YOU MAY HAVE SUBSTANTIVE RIGHTS AFFECTED BY THIS OBJECTION.

YOUR SUBSTANTIVE RIGHTS MAY ALSO BE AFFECTED BY FURTHER OBJECTIONS THAT MAY BE FILED IN THESE CHAPTER 11 CASES.

THE RELIEF SOUGHT IN THIS OBJECTION IS WITHOUT PREJUDICE TO THE RIGHTS OF THE DEBTORS, THEIR ESTATES, ANY SUCCESSORS THERETO OR ANY OTHER PARTY IN INTEREST TO PURSUE FURTHER OBJECTIONS AGAINST THE CLAIMS SUBJECT TO THIS OBJECTION, AND NOTHING HEREIN OR THE PROPOSED ORDER IS INTENDED OR SHALL BE DEEMED TO BE AN ALLOWANCE OF ANY SUCH CLAIMS.

PLEASE TAKE NOTICE that on May 30, 2025, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) have filed the attached *Debtors’ First Omnibus Objection to Certain Claims (Substantive)* (the “Objection”).²

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors’ mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

PLEASE TAKE FURTHER NOTICE that any responses (each, a “Response”) to the relief requested in the Objection must be filed on or before **4:00 p.m. (prevailing Eastern Time) on June 20, 2025 (the “Response Deadline”)** with the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801 (the “Court”). At the same time, any party submitting a Response (each, a “Respondent”) must serve a copy of its Response upon the undersigned counsel to the Debtor so as to be received on or before the Response Deadline.

PLEASE TAKE FURTHER NOTICE that any Response must contain, at a minimum, the following:

- a) a caption setting forth the name of the Court, the above-referenced case number, and the title of the Objection to which the Response is directed;
- b) the name of the claimant and description of the basis for the amount of the Reduced and Reclassified Claim, No Liability Claim or Reclassified Claim;
- c) a concise statement setting forth the reasons why a particular Reduced and Reclassified Claim, No Liability Claim or Reclassified Claim should not be reduced and reclassified, disallowed and expunged or reclassified for the reasons set forth in the Objection, including, but not limited to, the specific factual and legal bases upon which the claimant will rely in opposing the Objection at the Hearing.

PLEASE TAKE FURTHER NOTICE that the hearing to consider the objection will be held on **July 10, 2025 at 10:00 a.m. (prevailing Eastern Time) (the “Hearing”)** before The Honorable Craig T. Goldblatt, United States Bankruptcy Court Judge for the District of Delaware, 824 N. Market Street, 3rd Floor, Courtroom No. 7, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE OBJECTION WITHOUT FURTHER NOTICE OR A HEARING.

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² Capitalized terms not defined herein shall have the meanings ascribed to the terms in the Objection.

Dated: May 30, 2025
Wilmington, Delaware

/s/ Michael E. Fitzpatrick

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